

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
THIRD DIVISION

In re: Guidant Corp. Implantable
Defibrillators Products Liability Litigation

MDL No. 1708
(DWF/AJB)

This Document Relates to All Actions

**JOINT AGENDA FOR TELEPHONIC
STATUS CONFERENCE ON
FEBRUARY 14, 2006**

JOINT AGENDA FOR STATUS CONFERENCE ON FEBRUARY 14, 2006

Pursuant to this Court's Order Pretrial Order Number 5 (dated January 31, 2006),

Plaintiffs and Defendants have agreed upon the following agenda:

1. Report on Status of State Litigation and MDL ADR
2. Authentication Stipulation
3. Timing and production of documents in response to Plaintiffs' discovery requests, including Plaintiffs' requests for discovery deadlines applicable to priority discovery items
4. Production of documents relating to pre-emption defense
5. Production of documents Guidant produced to third parties
 - a. Guidant independent panel regarding device issues;
 - b. Due diligence materials in connection with the Boston Scientific acquisitions and the attempted acquisitions by Johnson & Johnson;
 - c. Heart Rhythm Society;
 - d. Foreign medical bodies and foreign medical agencies;
 - e. Senator Grassley and other Congressional hearings;
 - f. Government entities, including the Department of Justice (U.S. Attorneys) and the Securities & Exchange Commission;
 - g. Other third party productions.
6. Production of documents related to worldwide incidents related to Guidant cardiac devices at issue in the MDL litigation

7. Proposed PreTrial Order Regarding Plaintiffs' Time and Expense/Assessment Protocols
8. Report to the Court regarding outstanding issues
 - a. Redactions;
 - b. Privilege logs;
 - c. Document production issues;
 - d. Plaintiffs' document depository;
 - e. Amended preservation protocol;
 - f. Proposed electronic discovery protocol.
9. Status of remand motion briefing.